



THE COMMONWEALTH OF MASSACHUSETTS

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**
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June 21, 2006

VIA EMAIL AND USPS

Barbara Anne Sousa, Esq.
Assistant General Counsel
Verizon Massachusetts
185 Franklin Street, 13th Floor
Boston, MA 02110-1585

RE: Investigation by the Department of Telecommunications and Energy to establish a permanent surcharge to recover prudently incurred costs associated with the provision of wireline Enhanced 911 services, relay services for TDD/TTY users, communications equipment distribution for people with disabilities, and amplified handsets at pay telephones.
D.T.E. 06-4

Dear Attorney Sousa:

Enclosed please find the first set of information requests issued by the Department of Telecommunications and Energy ("Department") to Verizon New England, Inc. d/b/a Verizon Massachusetts ("Verizon") in the above-captioned matter. In accordance with the Procedural Notice issued in this docket, please submit Verizon's responses to the Department and the parties within ten (10) business days of the date of this request. See Procedural Notice, § III.D.1. If you have any questions regarding these information requests, please contact me at (617) 305-3578.

Sincerely,

/s/

Tina W. Chin
Hearing Officer

Encls.

cc: Service list (w/encls.)

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**FIRST SET OF INFORMATION REQUESTS OF THE
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY
TO VERIZON MASSACHUSETTS
D.T.E. 06-4**

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to Verizon New England, Inc. d/b/a Verizon Massachusetts (“Verizon”) the following Information Requests.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case, and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if Verizon or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses as follows: (a) one original to Mary L. Cottrell, Secretary of the Department; (b) one copy to all parties; (c) two copies to Tina W. Chin, Hearing Officer; and (d) one copy to each Department staff member listed on the current distribution list.

Requests

- DTE-VZ 1-1 What is the current deficit from the prior directory assistance funding scheme and how was that deficit calculated?
- DTE-VZ 1-2 Has Verizon conducted an independent audit of its residential directory assistance revenues and E911/disability access program costs to determine the accuracy of the current deficit level since the audit performed pursuant to the Department's directives in D.T.E. 03-63, the proceeding to establish the interim E911 surcharge? If not, what actions has Verizon taken to ensure the accuracy of the current deficit level?
- DTE-VZ 1-3 Identify all sources of revenue, including but not limited to revenue received from directory assistance, tariff fees, interconnection agreements, or from legislative assessments, used to offset E911 expenses. Provide the actual or anticipated level of E911 revenues from these sources for fiscal year ("FY") 2004 through FY 2008.
- DTE-VZ 1-4 Please provide a copy of the current relay services contract between Verizon and Sprint.
- DTE-VZ 1-5 What are the actual uncollectible E911 revenues for FY 2001 through FY2005?
- DTE-VZ 1-6 Provide data to support the deficit reduction amounts - attributable to the application of Verizon's directory assistance revenues beginning in September 2003 and projected through December 31, 2007 - contained in SETB's May 26, 2006 filing.
- DTE-VZ 1-7 Provide the current interest rate on the existing deficit, total accrued interest, and a five year projection of the remaining interest for Scenarios 1 and 2 of SETB's May 26, 2006 filing.